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Date: Fri, 04 Apr 2025 15:23:33 +0530

Subject: Draft CERC GNA Fourth amendment regulation 2025 || Comments EDF R India

===== Forwarded message =====

Dear Sir,

Greeting from EDF Renewables India Private Limited

EDF Renewables India is a leading independent power producer, generating grid scale power. We develop, build, and operate renewable power plant and have a decade of experience in India. Our operational portfolio mainly includes wind power projects, and pipeline includes hybrid as well as Battery storage solutions. Currently the company is into utility scale projects for state and central off-takers and C-PPAs.

At the outset, we extend our gratitude to CERC effort in promoting renewable energy landscape in the country. We would like to thank you for the opportunity to raise our concerns and suggestions on Central Electricity Regulatory Commission (Connectivity and General Network Access to the inter-State Transmission System) (Fourth Amendment) Regulations, 2025.

In this regard, please find enclosed our comments/suggestions on the Draft Regulation. Request to consider our comments on the draft regulation while finalizing the same.



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Comments / Suggestions on Draft CERC (GNA Fourth amendment) Regulations, 2025

Sr no	Clause as per CERC Draft GNA Fourth amendment	EDF R Proposed clause	Rationale
1.	<p>Annexure-IV</p> <p>Modalities of Restricted Access for Solar Hours and Non-Solar Hours of the day</p> <p>(1) Grant of Connectivity with restricted access to an entity covered under Regulation 5.11 (a) of these regulations:</p> <p>(a) Such entity shall be granted Connectivity with restricted access where:</p> <p>i. during non-solar hours, it shall be allowed to inject upto the Connectivity quantum, subject to availability in the transmission system,</p> <p>ii. during the solar hours, the injection rights shall be vested with the entity covered under Regulation 5.11(b) or (c) of these regulations.</p>	<p>Annexure-IV</p> <p>Modalities of Restricted Access for Solar Hours and Non-Solar Hours of the day</p> <p>(1) Grant of Connectivity with restricted access to an entity covered under Regulation 5.11 (a) of these regulations:</p> <p>(a) Such entity shall be granted Connectivity with restricted access where:</p> <p>i. during non-solar hours, it shall be allowed to inject upto the Connectivity quantum, subject to availability in the transmission system,</p> <p>ii. during the solar hours, the injection rights shall be vested with the entity covered under Regulation 5.11(b) or (c) of these regulations; <i>upto the capacity quantum granted to them.</i></p>	<p>There may be cases where connectivity granted to solar only projects may be less than 300 MW. The connectivity for balance capacity may be available with a non-solar project, which will also inject power during solar hours.</p>

2.	<p>Annexure-IV</p> <p>Provided, such entity under Regulation 5.11(a) may enter into an agreement with an entity under Regulation 5.11(b) or 5.11(c) with either of them as a lead generator or appoint a QCA (in terms of Grid Code), to utilize the access of an entity under Regulation 5.11(b) or 5.11(c) for the purpose of injection during solar hours.</p> <p>(b) Such entity shall be allowed to draw power from the Grid throughout the day, subject to transmission constraints.</p> <p>(c) Such entity, if participating under Ancillary services under the CERC (Ancillary Services Regulations), 2022 may be directed by RLDC or NLDC, as applicable for injection during solar hours or non-solar hours.</p> <p>(d) The scheduled date of commercial operation shall not be more than 18 months from the date of intimation of the in-principle grant of connectivity.</p> <p>(e) In case an entity covered under Regulation 5.11 (a) of these regulations is granted Connectivity through a sub-pooling station of an entity under Regulation 5.11(b) or 5.11(c), an agreement shall be entered into between these entities for sharing of a dedicated transmission system including payment of charges towards using the dedicated</p>	<p>Annexure-IV</p> <p>Provided, such entity under Regulation 5.11(a) may enter into an agreement with an entity under Regulation 5.11(b) or 5.11(c) with either of them as a lead generator or appoint a QCA (in terms of Grid Code), to utilize the access of an entity under Regulation 5.11(b) or 5.11(c) for the purpose of injection during solar hours. <i>In the event of a new transmission line to be constructed by either of the parties, the agreement will also specify the entity which will be responsible for construction of transmission line.</i></p> <p>(b) Such entity shall be allowed to draw power from the Grid throughout the day, subject to transmission constraints.</p> <p>(c) Such entity, if participating under Ancillary services under the CERC (Ancillary Services Regulations), 2022 may be directed by RLDC or NLDC, as applicable for injection during solar hours or non-solar hours.</p> <p>(d) The scheduled date of commercial operation shall not be more than 18 months from the date of intimation of the in-principle grant of connectivity.</p> <p>(e) In case an entity covered under Regulation 5.11 (a) of these regulations is granted Connectivity through a sub-pooling station of an entity under Regulation 5.11(b) or 5.11(c),</p>	<p>There may be cases where connectivity is simultaneously granted for entities with solar and non-solar projects for respective periods. The entities can mutually decide who would undertake construction of the transmission line. Provision needs to be kept for such situations.</p>
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	<p>transmission system in proportion to the quantum of Connectivity granted to each of such entities which shall be mutually agreed between the parties.</p> <p>(f) Nodal Agency shall publish, within 30 days of notification of this Regulations, the indicative Capital Cost of various configurations of the dedicated transmission system as a reference cost to enable cost sharing between entities. The Nodal Agency shall update such a list based on newer configurations and updated indicative capital cost.</p> <p>(g) In case the mutual agreement is not achieved for payment of charges for the dedicated transmission system, including sub-pooling station of an REGS, sharing of the dedicated transmission system shall be carried out as follows:</p> <p>i The entity under Regulation 5.11(b) or 5.11(c) shall not charge more than the indicative Capital cost of the similar configuration as notified by the Nodal Agency from the entity under Regulation 5.11(a) for using the dedicated transmission system, proportionate to the quantum of Connectivity for each entity.</p> <p>ii An entity covered under Regulation 5.11 (a) of these regulations shall be responsible for the implementation of any modification in the</p>	<p>an agreement shall be entered into between these entities for sharing of a dedicated transmission system including payment of charges towards using the dedicated transmission system in proportion to the quantum of Connectivity granted to each of such entities which shall be mutually agreed between the parties.</p> <p>(f) Nodal Agency shall publish, within 30 days of notification of this Regulations, the indicative Capital Cost of various configurations of the dedicated transmission system as a reference cost to enable cost sharing between entities. The Nodal Agency shall update such a list based on newer configurations and updated indicative capital cost.</p> <p>(g) In case the mutual agreement is not achieved for payment of charges for the dedicated transmission system, including sub-pooling station of an REGS, sharing of the dedicated transmission system shall be carried out as follows:</p> <p>i The entity under Regulation 5.11(b) or 5.11(c) <i>or the entity responsible for construction of the transmission line / system</i> shall not charge more than the indicative Capital cost of the similar configuration as notified by the Nodal Agency from the entity under Regulation 5.11(a) <i>or the entity under Regulation 5.11(b) or 5.11(c), in case the transmission line / system is</i></p>	
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	dedicated transmission system and for compliance with the Grid Code and other regulations of the Central Commission, at its own cost.	<p><i>constructed by the entity under Regulation 5.11(a)</i> for using the dedicated transmission system, proportionate to the quantum of Connectivity for each entity.</p> <p>ii An entity covered under Regulation 5.11 (a) of these regulations <i>responsible for construction of transmission line</i> shall be responsible for the implementation of any modification in the dedicated transmission system and for compliance with the Grid Code and other regulations of the Central Commission, at its own cost.</p>	
3	Additional comments	<p><i>Annexure-IV</i></p> <p><i>h) In case, at any point of time, it is found that the entity responsible for construction of transmission line has not undertaken the construction work as per schedule specified, Nodal Agency shall have the powers to change the responsibility for construction of transmission line to the other entity after issuing notice to the first party and getting commitment from the second party.</i></p> <p><i>i) The above regulations will also be applicable to the entities who have been granted connectivity under Regulations 5.6 or 5.7 for sharing the dedicated transmission system.</i></p>	The sharing of transmission line/system is an issue with the normal grant of connectivity and similar procedure may be used for sharing the system in general.